

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re: Michael A. Gral,

Case No. 16-21329-gmh
(Chapter 11)

Debtor.

UNITED STATES TRUSTEE'S OBJECTION TO DEBTOR'S
MOTION FOR EXTENSION OF TIME TO FILE SCHEDULES AND STATEMENT OF
FINANCIAL AFFAIRS UNDER BANKRUPTCY RULE 1007(c)

NOW COMES the United States Trustee, Patrick S. Layng, by Attorney Laura D. Steele, who objects to the Debtor's motion for extension of the time to file his schedules and statement of financial affairs pursuant to Fed. R. Bankr. P. 1007(c) as follows:

1. The Debtor filed a petition for relief under Chapter 11 on February 20, 2016.
2. Fed. R. Bankr. P. 1007(c) requires that schedules and statements must be filed within 14 days of filing the petition.
3. The Debtor's schedules and statements would have been due March 5, 2016.
4. The Debtor seeks to extend that deadline to March 26, 2016, due to the need for first-day motions and "other preliminary matters." *See* Docket No. 6.
5. The United States Trustee has set March 28, 2016, at 10 a.m. for the § 341 meeting of creditors.
6. If the Debtor is not required to file his schedules until March 26, 2016, creditors who are not otherwise disclosed in the Debtor's matrix may not receive adequate notice of the § 341 meeting of creditors.

Attorney Laura D. Steele
Attorney for the United States Trustee
517 East Wisconsin Avenue, Suite 430
Milwaukee, WI 53202
Phone (414) 297-4499 / Fax (414) 297-4478

7. Neither creditors nor the United States Trustee will have adequate time to review the schedules and statement of financial affairs, which is necessary to conduct a meaningful § 341 meeting of creditors.
8. Moreover, the Debtor discloses that his proposed counsel has expended \$20,000 pre-petition to prepare this case (and two other related cases) for filing and to prepare preliminary motions. *See* Docket No. 7 at ¶ 9. If counsel has already spent considerable time preparing this case for filing, it is unclear why such a lengthy extension is necessary.
9. Accordingly, the United States Trustee requests that the Court limit any extension of the deadline to file schedules and statements to 14 days, or no later than March 21, 2016.

WHEREFORE, the United States Trustee requests that the Court deny the Debtor's motion and limit any extension to 14 days, or no later than March 21, 2016. The United States Trustee does not intend to file a brief in connection with this pleading, but reserves the right to file a responsive brief or pleading if necessary.

Dated: February 24, 2016.

PATRICK S. LAYNG
United States Trustee

LAURA D. STEELE
Attorney for the United States Trustee